

# HAFETZ & NECHELES LLP

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May 15, 2019

**VIA ECF**

Honorable Nicholas G. Garaufis  
United States District Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: *United States v. Ranieri, et al.*, 18-cr-204 (NGG) (VMS)

Dear Judge Garaufis:

Pursuant to the terms of the plea agreement entered into between Clare Bronfman and the United States, Ms. Bronfman is required to forfeit the sum of \$6 million to the government within 60 days of her guilty plea.

As the Court may recall, at the time that the Court set bail for Ms. Bronfman, the advisors to the trust that is held for her benefit agreed to inform the Court before authorizing any extraordinary expenditure from the trust beyond ordinary expenses for her health, education, welfare, and legal representation.

Accordingly, in an abundance of caution, we write to seek the Court's explicit authorization under the terms of Ms. Bronfman's conditions of release for the trust advisors to approve and direct the payment of \$6 million to the government in satisfaction of Ms. Bronfman's forfeiture obligation under the plea agreement.

Respectfully submitted,

/s/

Kathleen E. Cassidy

cc: AUSAs Moira Kim Penza, Tanya Hajjar, and Karin Orenstein (by ECF)  
J. Bruce Maffeo, Esq., counsel to the trust advisors (by email)  
Leslie Geller, Esq. (by email)  
Joseph Weilgus (by email)